

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

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KEITH FORD, *individually and on behalf  
of all others similarly situated*

Plaintiff,

CIVIL ACTION NO. \_\_\_\_\_

v.

UHG I, LLC, UNITED HOLDINGS  
GROUP, LLC and HARRISLOFTUS,  
PLLC,

Defendants.

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**NOTICE OF REMOVAL (FEDERAL QUESTION)**

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

Pursuant to 28 U.S.C. §§ 1331 and 1441 *et seq.*, and 15 U.S.C. § 1692 *et seq.*, Defendant HarrisLoftus, PLLC (“Defendant”), with the consent of Co-Defendants UHG I, LLC and United Holdings Group, LLC, hereby gives notice of removal of this cause of action, under the caption *Keith Ford, individually and on behalf of all others similarly situated v. UGH I, LLC, United Holdings Group, LLC and HarrisLoftus, PLLC* from the Circuit Court for Anne Arundel County, Maryland, under Case No. C-02-CV-22-000317 (“State Court Action”) to the United States District Court for the District of Maryland. In support of removal, Defendant, by and through its attorneys, states as follows:

1. On February 21, 2022, Plaintiff Keith Ford (“Plaintiff”) filed this action in the Circuit Court for Anne Arundel County, Maryland. A copy of the state court record is attached as Exhibit 1. The undersigned is not aware of any other documents that have been filed in this matter.

2. Plaintiff served Defendant on March 9, 2022. This removal is timely pursuant to 28 U.S.C. § 1446(b).

3. This action is a civil action of which this Honorable Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by Defendant pursuant to 28 U.S.C. § 1441(b) in that it presents a federal question, wherein Plaintiff alleges violations of the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692, *et seq.* This Court is the proper district for removal because the Circuit Court for Anne Arundel County, Maryland is located within the jurisdiction of the United States District Court for the District of Maryland.

4. Co-Defendants UHG I, LLC and United Holdings Group, LLC, consent to this removal.

5. Notice of this removal will be filed with the Circuit Court for Anne Arundel County, Maryland.

6. By virtue of this Notice of Removal of Action and the Notice filed in the Action, Defendant does not waive its rights to assert any personal jurisdictional defenses or file other pre-answer motions including Federal Rule of Civil Procedure 12 motions and/or motions to compel arbitration as permitted by the Federal Rules of Civil Procedure.

WHEREFORE, Defendant requests that further proceedings in the Circuit Court for Anne Arundel County, Maryland, be discontinued and that this action be removed in its entirety to the United States District Court for the District of Maryland, which will then assume full jurisdiction over this cause of action.

THE LAW OFFICES  
OF RONALD S. CANTER, LLC

/s/ Ronald S. Canter

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*Attorney for Defendant HarrisLoftus, PLLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby states that on April 7, 2022 he served the following parties with a copy of the Notice of Removal in Federal Court with Exhibits, Civil Cover Sheet and this Certificate of Service via first class mail, postage prepaid as follows:

Emanwel J. Turnbull, Esq.  
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*Attorney for Defendants UHG I, LLC and United Holdings Group, LLC*

/s/ Ronald S. Canter

Ronald S. Canter, Esq.  
*Attorney for Defendant HarrisLoftus, PLLC*